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THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

CHANEL, INC.,	)	Case No. 2:11-cv-01508-APG-PAL
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
EUKUK.COM, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**FINAL DEFAULT JUDGMENT AND  
PERMANENT INJUNCTION  
AGAINST DEFENDANTS IDENTIFIED ON SCHEDULE "A"**

THIS MATTER having come before the Court upon motion by Plaintiff, CHANEL, INC. ("Chanel" or "Plaintiff") for entry of final default judgment of its claims against the Partnerships and Unincorporated Associations (collectively, the "Defendants") operating under the domain names (the "Subject Domain Names") identified on the attached Schedule A pursuant to Rule 55(b)(2) of

the Federal Rules of Civil Procedure and entry of a permanent injunction; and the Court having considered the moving papers and there being no opposition thereto, and upon the following entries of Default by the Clerk on April 24, 2013 (e-docket 167) and May 13, 2013 (e-docket 173);






IT IS HEREBY ORDERED that Plaintiff's Motion for Entry of Final Default Judgment and Permanent Injunction is GRANTED, and judgment is hereby entered in favor of Plaintiff, CHANEL, INC., a New York corporation, with its principal place of business in the United States located at Nine West 57th Street, New York, New York 10019, and against Defendants on all Counts of the Third Amended Complaint as follows:




(1) Permanent Injunctive Relief:

The Defendants identified on Schedule "A" and their officers, agents, servants, employees, and attorneys, and all persons acting in concert and participation with the Defendants identified on Schedule "A" are hereby permanently restrained and enjoined from:

- (a) manufacturing or causing to be manufactured, importing, advertising, or promoting, distributing, selling or offering to sell counterfeit and infringing goods using the trademarks identified below:

Trademark	Registration Number	Registration Date	Class(es)/Goods
CHANEL	0,612,169	September 13, 1955	IC 014 - Necklaces
CHANEL	0,626,035	May 1, 1956	IC 018 – Women's Handbags
CHANEL	0,902,190	November 10, 1970	IC 014 - Bracelets, Pins, and Earrings
CHANEL	0,906,262	January 19, 1971	IC 025 - Coats, Suits, Blouses, and Scarves

1	CHANEL	0,915,139	June 15, 1971	IC 025 - Women's Shoes
2				
3	CHANEL	0,955,074	March 13, 1973	IC 014 – Watches
4				
5		1,241,264	June 7, 1983	IC 025 - Suits, Jackets, Skirts, Dresses, Pants, Blouses, Tunics, Sweaters, Cardigans, Tee-Shirts, Coats, Raincoats, Scarves, Shoes and Boots
6				
7	CHANEL	1,241,265	June 7, 1983	IC 025 - Suits, Jackets, Skirts, Dresses, Pants, Blouses, Tunics, Sweaters, Cardigans, Coats, Raincoats, Scarves, Shoes and Boots
8				
9		1,271,876	March 27, 1984	IC 025 - Clothing-Namely, Coats, Dresses, Blouses, Raincoats, Suits, Skirts, Cardigans, Sweaters, Pants, Jackets, Blazers, and Shoes
10				
11		1,314,511	January 15, 1985	IC 018 - Leather Goods-Namely, Handbags
12				
13	CHANEL	1,347,677	July 9, 1985	IC 018 - Leather Goods-namely, Handbags
14				
15		1,501,898	August 30, 1988	IC 006 – Keychains IC 014 - Costume Jewelry IC 016 - Gift Wrapping Paper IC 025 -Blouses, Shoes, Belts, Scarves, Jackets, Men's Ties IC 026 – Brooches and Buttons for Clothing
16				
17	CHANEL	1,510,757	November 1, 1988	IC 009 – Sunglasses
18				
19		1,654,252	August 20, 1991	IC 009 – Sunglasses
20				
21				
22				
23				
24				
25				
26				
27				
28				

CHANEL	1,733,051	November 17, 1992	IC 018 - Leather Goods; namely, Handbags, Wallets, Travel Bags, Luggage, Business and Credit Card Cases, Change Purses, Tote Bags, Cosmetic Bags Sold Empty, and Garment Bags for Travel
	1,734,822	November 24, 1992	IC 018 - Leather Goods; namely, Handbags, Wallets, Travel Bags, Luggage, Business Card Cases, Change Purses, Tote Bags, and Cosmetic Bags Sold Empty
J12	2,559,772	April 9, 2002	IC 014 - Timepieces; namely, Watches, and Parts Thereof
	3,025,934	December 13, 2005	IC 018 – Handbags
	3,025,936	December 13, 2005	IC 009 - Mobile Phone Straps, Eyeglass Frames, Sunglasses IC 025 - Gloves, Swimwear IC 026 - Hair Accessories namely Barrettes and Pony-Tail Holders
CHANEL	3,133,139	August 22, 2006	IC 014 - Jewelry and Watches

(collectively, the “Chanel Marks”);

- (b) using the Chanel Marks in connection with the sale of any unauthorized goods;
- (c) using any logo, and/or layout which may be calculated to falsely advertise the services or products of the Defendants identified on Schedule “A” hereto as being sponsored by, authorized by, endorsed by, or in any way associated with Plaintiff;
- (d) falsely representing themselves as being connected with Plaintiff, through sponsorship or association;

- 1 (e) engaging in any act which is likely to falsely cause members of the trade  
2 and/or of the purchasing public to believe any goods or services of the  
3 Defendants identified on Schedule A are in any way endorsed by, approved  
4 by, and/or associated with Plaintiff;
- 5 (f) using any reproduction, counterfeit, copy, or colorable imitation of the Chanel  
6 Marks in connection with the publicity, promotion, sale, or advertising of any  
7 goods sold by the Defendants identified on Schedule A, including, without  
8 limitation, handbags, wallets, shoes, boots, sunglasses, scarves, tee shirts,  
9 watches, costume jewelry, including necklaces, bracelets, earrings, brooches,  
10 and rings;
- 11 (g) affixing, applying, annexing or using in connection with the sale of any goods,  
12 a false description or representation, including words or other symbols tending  
13 to falsely describe or represent goods offered for sale or sold by the  
14 Defendants identified on Schedule A as being those of Plaintiff or in any way  
15 endorsed by Plaintiff;
- 16 (h) otherwise unfairly competing with Plaintiff;
- 17 (i) effecting assignments or transfers, forming new entities or associations or  
18 utilizing any other device for the purpose of circumventing or otherwise  
19 avoiding the prohibitions set forth above; and
- 20 (j) using the Chanel Marks, or any confusingly similar trademarks, within  
21 domain name extensions, metatags or other markers within website source  
22 code, from use on any webpage (including as the title of any web page), any  
23 advertising links to other websites, from search engines' databases or cache  
24 memory, and any other form of use of such terms which is visible to a  
25 computer user or serves to direct computer searches to websites registered by,  
26 owned, or operated by the Defendants identified on Schedule A.
- 27 (2) Additional Equitable Relief:
- 28 (a) In order to give practical effect to the Permanent Injunction, the Subject  
Domain Names are hereby ordered to be immediately transferred by  
Defendants, their assignees and/or successors in interest or title, and the  
Registrars to Plaintiff's control. To the extent the current Registrars do not  
facilitate the transfer of the domain names to Plaintiff's control within five (5)  
days of receipt of this judgment, the Registries shall, within thirty (30) days,  
change the Registrar of Record for the Subject Domain Names to a Registrar  
of Plaintiff's choosing, and that Registrar shall transfer the Subject Domain  
Names to Plaintiff;
- (b) Upon Plaintiff's request, the top level domain (TLD) Registry for each of the  
Subject Domain Names, within thirty (30) days of receipt of this Order, shall  
place the Subject Domain Names on Registry Hold status for the life of the  
current registration, thus removing them from the TLD zone files maintained

by the Registries which link the Subject Domain Names to the IP addresses where the associated websites are hosted; and

(c) Upon Plaintiff's request, the Internet Corporation for Assigned Names and Numbers ("ICANN") shall ensure that the top level domain Registries responsible for the Subject Domain Names transfer, change the Registrar of Record, and/or disable the Subject Domain Names.

(3) The bond posted by Plaintiff in the amount of \$20,000.00 is ordered to be released by the Clerk.

(4) The Internet Registries for the domain names listed on the Schedule A attached to the Notice of Voluntary Dismissal Without Prejudice of Defendants 870-1016 (e-docket 163) and the domain names listed on the Schedule A attached to the Notice of Voluntary Dismissal Without Prejudice of Defendants 399, 449, 469, 475, 517, 563, 571, 748, 1051, 1068, 1070, 1071, 1074, 1084, 1086, 1093, 1094, 1095, 1099, 1100, 1110, 1132, 1142, 1154, 1185, 1188, 1193, 1199, 1201, 1210, 1220, 1224, 1232, 1233, 1234, 1235, 1236, 1241, 1249, 1261, 1294, and 1305 (e-docket 171) shall revert the Registrars of Record of those domain names to the Defendants' Registrars at the time the Registrars of Record were updated pursuant to the Temporary Restraining Orders entered in this matter.

(5) This Case is **CLOSED**, and all pending motions are **DENIED** as **MOOT**.

IT IS SO ORDERED.

DATED: June 17, 2013.



ANDREW P. GORDON  
UNITED STATES DISTRICT JUDGE